

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

VLSI TECHNOLOGY LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

**Case No. 6:21-cv-00057-ADA**

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION TO WITHDRAW STEVEN LIEBERMAN AND  
RACHEL M. ECHOLS AS COUNSEL FOR PLAINTIFF VLSI TECHNOLOGY LLC**

Pursuant to Local Rule AT-3, Plaintiff VLSI Technology LLC (“VLSI”), files this Unopposed Motion to Withdraw Steven Lieberman and Rachel M. Echols as Counsel for VLSI (the “Motion”) and shows:

1. Steven Lieberman and Rachel M. Echols, having previously appeared as counsel for VLSI in the above referenced action, are members of the firm of Rothwell, Figg, Ernst & Manbeck, P.C., which no longer represents VLSI in this action. Accordingly, Mr. Lieberman and Ms. Echols will no longer be representing VLSI in this action and hereby request to be withdrawn as counsel of record for VLSI.

2. VLSI will continue to be represented by Irell & Manella LLP and Mann | Tindel | Thompson, and all future correspondence or papers filed or served in this action should continue to be directed to these law firms.

3. VLSI has contacted Defendant Intel Corporation (“Intel”) with respect to the filing of this Motion and Intel is unopposed to the granting of this Motion and the withdrawal of Mr. Lieberman and Ms. Echols as counsel for VLSI in this action.

Accordingly, VLSI requests the Court to grant this Unopposed Motion to Withdraw Steven Lieberman and Rachel M. Echols as Counsel for VLSI and to enter an order permitting the withdrawal of Mr. Lieberman and Ms. Echols as counsel of record for VLSI in the above referenced action and for such other and further relief as the Court deems suitable and just.

<p>Dated: February 25, 2022</p> <p>Morgan Chu (<i>pro hac vice</i>)      Benjamin W. Hattenbach (<i>pro hac vice</i>)      Iian D. Jablon (<i>pro hac vice</i>)      Alan J. Heinrich (<i>pro hac vice</i>)      Ian Robert Washburn (<i>pro hac vice</i>)      Amy E. Proctor (<i>pro hac vice</i>)      Elizabeth C. Tuan (<i>pro hac vice</i>)      Dominik Slusarczyk (<i>pro hac vice</i>)      Charlotte J. Wen (<i>pro hac vice</i>)      Benjamin Monnin (<i>pro hac vice</i>)      Jordan Nafekh (<i>pro hac vice</i>)      Christopher Abernethy (<i>pro hac vice</i>)      Keith Orso (<i>pro hac vice</i>)      Michael D. Harbour (<i>pro hac vice</i>)  <b>IRELL &amp; MANELLA LLP</b>      1800 Avenue of the Stars, Suite 900      Los Angeles, California 90067      Telephone: (310) 277-1010      Facsimile: (310) 203-7199      mchu@irell.com      bhattenbach@irell.com      ijablon@irell.com      aheinrich@irell.com      iwashburn@irell.com      aproctor@irell.com      etuan@irell.com      dslusarczyk@irell.com      cwen@irell.com      bmonnin@irell.com      jnafekh@irell.com      cabernethy@irell.com      korso@irell.com      mharbour@irell.com   </p>	<p>By: <u>/s/ Andy Tindel</u></p> <p>J. Mark Mann (Texas Bar No. 12926150)      mark@themannfirm.com      G. Blake Thompson (Texas Bar No. 24042033)      blake@themannfirm.com  <b>MANN   TINDEL   THOMPSON</b>      300 W. Main Street      Henderson, Texas 75652      Telephone: (903) 657-8540      Facsimile: (903) 657-6003</p> <p>Andy Tindel (Texas Bar No. 20054500)      atindel@andytindel.com  <b>MANN   TINDEL   THOMPSON</b>      112 E. Line Street, Suite 304      Tyler, Texas 75702      Telephone: (903) 596-0900      Facsimile: (903) 596-0909</p> <p>Craig D. Cherry (Texas Bar No. 24012419)      ccherry@swclaw.com  <b>STECKLER, WAYNE, COCHRAN, CHERRY, PLLC</b>      100 N. Ritchie Road, Suite 200      Waco, Texas 76701      Telephone: (254) 776-3336      Facsimile: (254) 776-6823</p> <p><i>Attorneys for VLSI Technology LLC</i></p>
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<p>Babak Redjaian (<i>pro hac vice</i>) <b>IRELL &amp; MANELLA LLP</b> 840 Newport Center Drive, Suite 400 Newport Beach, California 92660 Telephone: (949) 760-0991 Facsimile: (949) 760-5200 bredjaian@irell.com</p>	

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing instrument was served or delivered electronically via U.S. District Court [LIVE] — Document Filing System, to all counsel of record, on February 25, 2022.

/s/ Andy Tindel  
Andy Tindel